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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,)	2:15-cr-00198-GMN-NJK
)	
15 Plaintiff,)	
)	JOINT MOTION TO VACATE
16 v.)	PRETRIAL DEADLINES, CALENDAR
)	CALL, AND TRIAL DATE, AND FOR A
17 JUNZO SUZUKI & PAUL SUZUKI,)	STATUS CONFERENCE
)	
18 Defendants.)	

19 The United States of America and Defendants Junzo Suzuki and Paul Suzuki, by and
20 through their undersigned counsel, respectfully submit and request as follows:

21 That the Court schedule at its earliest convenience a status conference at which a
22 continuance of trial can be discussed and a new trial date selected. Plea negotiations between the
23 parties have ceased, and the parties expect this case to proceed to trial, which will take
24 approximately three weeks. Counsel for the defendants have continued to diligently review

discovery provided by the government and prepare for a defense at trial. Counsel for the defendants and the government anticipate needing to make motions for Rule 15 depositions of witnesses in Japan. To allow sufficient time to schedule and take such depositions, a continuance of trial will be needed. Furthermore, given the number of witnesses from Japan who will likely need to travel to Las Vegas to testify on behalf of both the defense and the government, a firm trial date will need to be selected, which may be complicated by the Court's current trial schedule in *United States v. Palafox et al.*, 2:16-cr-265 (D. Nev.)

For the reasons discussed above, the parties jointly and respectfully request that the Court vacate the current pretrial motions schedule, calendar call, and trial date, and schedule a status conference to select new dates.

Dated: March 10, 2020

ROBERT ZINK
Chief, Fraud Section
Criminal Division,
United States Department of Justice

_____/s/_____
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Counsel for Defendants Junzo Suzuki and
Paul Suzuki

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DATED this 10th day of March, 2020.

/s/ William Johnston
WILLIAM JOHNSTON
Assistant Chief
Criminal Division, Fraud Section

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUNZO SUZUKI & PAUL SUZUKI,

Defendants.

ORDER VACATING PRETRIAL DEADLINES, CALENDAR CALL, AND TRIAL DATE, AND SCHEDULING STATUS CONFERENCE

Dated this 11 day of March, 2020.

1